DATE OUT: 4/12/2013

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: TGAI[]; MUP []; EUP [X] BARCODE NO.: 406734 REG,/FILE SYMBOL NO.: 75757-2

PRODUCT NAME: CDG Solution 3000 MRID NOS: 468898-01, 468898-03, 468898-04, 469102-02,

470344-01, 470344-02, 470373-01, and 470373-02

COMPANY NAME: CDG Environmental, LLC ACTION CODE: 676

FROM: Sergey Alekseyev, Chemist

Product Chemistry Team

Risk Management and Implementation Branch V

Pesticide Re-evaluation Division (7508P)

TO: Veronica Dutch, CRM

Risk Management and Implementation Branch V

Pesticide Re-evaluation Division (7508P)

INTRODUCTION:

A Reregistration Eligibility Decision (RED), Case No. 4023, was issued on August 2006 for the Active Ingredient Chlorine Dioxide. According to the RED, the generic database supporting the reregistration of Chlorine Dioxide for currently registered uses has been reviewed and found to be substantially complete.

In the 8-month response to the Chlorine Dioxide RED, CDG Environmental, LLC provided EPA Form 8570-35 (Data Matrix), dated 04/25/2012; EPA Form 8570-4 (Confidential Statement of Formula), one basic and one alternative formulation, dated 04/15/2013; a draft label, punch date 04/26/2012; and MRID Nos. 468898-01, 468898-03, 468898-04, 469102-02, 470344-01, 470344-02, 470373-01, and 470373-02. The registrant is requesting reregistration of the product, CDG Solution 3000, EPA Reg. No. 75757-2.

FINDINGS:

- 1. EPA Reg. No. **75757-2** is an end-use product containing the active ingredient Chlorine Dioxide, with a label claim nominal concentration of 0.3%, and other ingredients content of 99.7%. The product is for use in purification of water (potable and cooling). The product is produced by a non-integrated system.
- 2. The CSFs for both formulations are acceptable. The nominal concentration of the active ingredient agrees with that on the label, meeting PR Notice 91-2. The certified limits for the active ingredient and the inert ingredients are acceptable in accordance with 40 CFR §158.350. All ingredients are cleared for use in pesticide formulations.
- 3. Except for Finding 4, data reported for MRID Nos. 468898-01, 468898-03, 468898-04, 469102-02, 470344-01, 470344-02, 470373-01, and 470373-02 satisfy the product chemistry data requirements under Subgroups A and B which pertain to Product Identity and Composition, and Physical and Chemical Properties, respectively.
- 4. MRID Nos. 468898-01, 468898-03, 468898-04, 469102-02, 470344-01, 470344-02, 470373-01, and 470373-02 do not contain data pertinent to Color, Physical State, Odor, Explodability, Miscibility, Corrosion Characteristics, and Dielectric Breakdown Voltage studies. Therefore Guidelines 830.6302, 830.6303, 830.6304, 830.6316, 830.6319, 830.6320, and 830.6321 have not been satisfied. Explodability, Miscibility, and Dielectric Breakdown Voltage studies may be waived upon request with proper justification.

5. The Ingredients Statement on the draft label is acceptable as per 40 CFR §156.10(g) and PR Notices 91-2, 97-5, and 97-6. Physical or Chemical Hazards statements are in accordance with 40 CFR §156.78. The Storage and Disposal Statements are acceptable in accordance with 40 CFR §156.10(i)(2)(ix) and PR Notice 83-3.

CONCLUSIONS:

The registrant will satisfy the product chemistry requirements for the reregistration of EPA Reg. No. 75757-2 after submission of data pertinent to Color, Physical State, Odor, Explodability, Miscibility, Corrosion Characteristics, and Dielectric Breakdown Voltage studies.

Product Chemistry Data

Subgroup A: Series 830.1550 - 830.1800 (40 CFR 158.155 - 158.180)

GUIDELINE REFERENCE NO. (GRN)/ TITLE 830	40 CFR §	MRID Number	Data Fulfilled
.1550 Product Identity and Composition	158.320	CSF	Y
.1600 Description of Materials Used to Produce the Product	158.325	468898-01	Y
.1620 Description of Production Process	158.330		N/A
.1650 Discussion of Formulation Process	158.165	468898-01	Y
.1670 Discussion of Formation of Impurities	158.167	468964-01	Y
.1700 Preliminary Analysis	158.345		N/A
.1750 Certified Limits	158.350	CSF	Y
.1800 Enforcement Analytical Method	158.355	469102-02	Y

Subgroup B: Series 830.6302 - 7950 (40 CFR 158.190)

Guideline Reference No. (GRN) / Title 830	Value or Qualitative Description	MRID Number	Data Fulfilled
.6302 Color		Number	G
.6303 Physical State			G
.6304 Odor			G
.6313 Stability	The product is not TGAI/MP		N/A
.6314 Oxidation/Reduction	The product is oxidizer, not reducer	470373-01	Y
Chemical Incompatibility	The product is oxidizer, not reducer	170373 01	1
.6315 Flammability/Flame	The product does not contain flammable liquid		N/A
Extension	1		
.6316 Explodability			G
.6317 Storage Stability	The product is stable after 90 days at 40 °C or	468898-03	Y
	180 days at 10 °C		
.6319 Miscibility			G
.6320 Corrosion			G
Characteristics			
.6321 Dielectric Breakdown			G
Voltage			
.7000 pH	3.38 at 21 °C	470344-02	Y
.7050 UV/ Visible Light	Not applicable. The product is not TGAI/MP.		N/A
Absorption			
.7100 Viscosity	0.986 cSt at 22 °C	470373-01	Y
.7200 Melting Point	Not applicable. The product is not TGAI/MP.		N/A
.7220 Boiling Point	Not applicable. The product is not TGAI/MP.		N/A
.7300 Density/Bulk Density	1.0003 at 21 °C	470373-01	Y
.7370 Dissociation Constant in	Not applicable. The product is not TGAI/MP.		N/A
Water			
.7550 Octanol/ Water Partition	Not applicable. The product is not TGAI/MP.		N/A
Coefficient			
.7840 Solubility to Water and	Not applicable. The product is not TGAI/MP.		N/A
Organic Solvents			
.7950 Vapor Pressure	Not applicable. The product is not TGAI/MP.		N/A

Explanations: Y = Requirement fulfilled; N = Requirement not fulfilled; N/A = Not applicable; G = Data gap; U = Upgradeable; I = Incomplete or in progress; W = Waived